

with these modest requirements makes it difficult to measure compliance with and the effect of the CTA.¹³³

B. The FCC Should Educate the Public About What the CTA and Its Rules Require and What Action They Can Take to Enforce the CTA

Commenters agree with the thrust of the Notice to increase a dialogue between stations and the public.¹³⁴ But for a dialogue to be effective, the public needs to know what the CTA and its rules require and what they can do under the CTA. To educate the public, the FCC should require all stations to periodically announce over the air that the Children's Television Act and FCC regulations require stations to air children's educational programming, maintain children's programming files and make those files available for public inspection.¹³⁵ This will inform those persons who are not currently aware of the CTA's existence and invite them to take an active role in monitoring it.

In addition, the FCC should explicitly state what rights members of the public have to seek enforcement of the CTA. This can best be achieved by the creation and distribution of a Children's Television Manual to parents and educators. Precedent for the creation of such a manual can be found in another manual adopted by the Commission in 1974 to increase public

¹³³ See Commissioner Chong's separate statement, 10 FCC Rcd. 6372 (1995).

¹³⁴ Notice at ¶¶ 21-26.

¹³⁵ Licensees could make an announcement similar to the one required by them to advise the public that their license is coming up for renewal. See 47 CFR § 73.3580 (d)(4)(i) and (ii) (1992).

participation in the Commission's procedures entitled The Public and Broadcasting--A Procedure Manual.¹³⁶ A Children's

Television Manual could similarly make explicit to the public how and when it can bring to the FCC's attention deficiencies with a licensee's compliance with the CTA.

Commenters also agree with the Notice that each station should identify a person who is responsible for collecting comments on the station's compliance with the CTA.¹³⁷ This would give the public an individual to complain to in the event the station fails to comply. In addition, the Commission could establish and publicize an "800" number which consumers could call for assistance in obtaining public information from licensees and filing complaints with the station or the Commission itself.

Clarifying these procedures will encourage communication between the public and stations so that the community has an opportunity to try to work with broadcasters. However, if voluntary communications fail, citizens will nevertheless be armed with the information and the know-how necessary to inform the Commission of violations of the CTA and also how to follow through with citizen complaints to see that compliance is mandated.

¹³⁶ 39 Fed. Reg. 32288 (1974) [hereinafter Manual]. The Public and Broadcasting Manual included information about how to file informal objections and petitions to deny stations applications for license renewal.

¹³⁷ Notice at ¶ 25.

C. The FCC Should Not Wait Until License Renewal to Ensure Stations Comply with the CTA During the Licenses Term

While we support the efforts to increase community involvement in enforcement of the CTA, the Commission cannot abdicate its own enforcement obligations to the public. The CTA requires every licensee to serve children,¹³⁸ not just licensees in communities with active viewing citizenry. Therefore, Commenters strongly oppose the suggestion that persons challenging a station's license renewal should be required to show that they had first contacted the station regarding its noncompliance with the CTA and requested the station to correct the noncompliance before issuing a challenge.¹³⁹ Such a requirement is not only unduly burdensome to the public, but also blatantly ignores Congress' statutory mandate that the FCC, regardless of action taken or not taken by the public, consider whether licensees have served the needs of children through their programming. The public's statutory right to challenge a licensee at renewal is not conditioned on its first notifying the station.¹⁴⁰ Moreover, requiring persons who wish to challenge license renewals to go to the station first will increase procedural obstacles, prevent legitimate complaints from being heard, and deny the FCC an important source of information.

¹³⁸ The Children Television Act requires the Commission to examine all licensees for compliance with the CTA at license renewal, whether or not a citizen complaint or petition to deny a particular stations license has been filed. 47 USC 303(a).

¹³⁹ Notice at 74.

¹⁴⁰ 47 U.S.C 309(d).

Furthermore, because television license terms are for five years,¹⁴¹ it serves the interest of children for the FCC to ensure broadcasters comply with the CTA during the license term and not just once every five (or ten, if the Telecommunications legislation passes) years. To wait until renewal to reprimand or sanction a broadcaster severely neglects children's needs for educational and informational programming during their developmental formative years. Therefore, the Commission should implement a mid-term review procedure of each station modeled after the interim review adopted in Equal Employment area.¹⁴²

If at midterm review, a station's core programming conformed with the Commission's programming standard, no further review would be necessary. However, if at midterm review a licensee failed to adhere to the Children's Televisions CTA, it could be subject to a warning, forfeiture, a call for early renewal, or

¹⁴¹ And proposed initiatives would lengthen them to ten years. See S. 652, 104th Cong., 1st Sess. § 206(c) "no license shall be granted for a term longer than 10 years"; H.R. 1555, 104th Cong., 1st Sess. § 304 ...

¹⁴² Under the FCC's EEO rules, stations are required to undergo a mid-term review to see if they are in compliance with the EEO rules. 47 C.F.R. 73.2080(d) (1994). If a station's employment profile falls below the Commission's EEO guidelines, it will "receive a letter noting any necessary improvements identified as a result of the review." Id. Mid-term review serves as an early warning that the licensee's EEO policies need improvement. Implementation of Section 22 of the Cable Television Consumer Protection and Competition Act of 1992, 8 FCC Rcd. 5389, 5392 (1993). The advantage of utilizing midterm review is that it enables the Commission to instruct non-compliant stations as to how better comply with the Commission's rules and to correct performance problems midterm.

license revocation, depending on the severity of the non-conformance.

V. COMMENTERS OPPOSE THE ADOPTION OF THE PROGRAM SPONSORSHIP

The Notice inquires as to whether stations should be permitted to meet their obligations under the CTA by fulfilling all but one hour of the FCC's programming standard through the sponsorship of core programming on other stations in the same market.¹⁴³ Commenters strongly oppose the adoption of the sponsorship approach because it creates disincentives to airing quality educational children's programming.

A. Program Sponsorship Would Reduce the Availability of Educational Programming and Increase the Administrative Costs of Complying with the CTA

The Commission's program sponsorship approach appears to be modeled after market share theories adopted in environmental regulation. However, unlike the environmental market share theory, which creates incentives for compliance with environmental regulations, program sponsorship creates a disincentive to devote resources to children's educational programming and hence, undermines the goals of the CTA. Market approaches were adopted in the environmental area to reduce overall emission pollution levels. The EPA would set acceptable levels of chemical pollution for individual facilities and in order to meet those levels, a company could purchase credits from a company whose facility was already below the allowable level. This system gave companies an economic incentive to maintain

¹⁴³ Notice at ¶ 81.

their facilities' pollution levels below the allowable level so that they could sell their credits. Thus, the market share approach encourages compliance with emission regulations by rewarding companies to redeem pollution.

In contrast, adoption of this market share approach in the children's television marketplace would create disincentives to the airing of educational programs. In providing a "host station"¹⁴⁴ with financial or other "in kind" support for fulfilling a portion of its programming requirements,¹⁴⁵ the sponsoring station¹⁴⁶ would seek to minimize its cash "pay-out," while a host station would spend a minimal amount of the sponsorship fee it receives on producing the children's educational programming to maximize its profit on the trade.¹⁴⁷ Because another station would be airing the programming, the sponsoring station would be less concerned with what effect a poorly produced show would have on its station's reputation and audience retention. Therefore, the sponsorship approach gives stations an incentive to produce cheap, low quality, educational programming.

Commenters are also concerned that the Commission's

¹⁴⁴ The "host station" is the station receiving the financial or in kind support to air another station's programming.

¹⁴⁵ Notice at ¶ 77.

¹⁴⁶ The "sponsoring station" is the station who pays or provides programming to another station to air.

¹⁴⁷ Similarly, under the "in kind" approach, the sponsor station would have an incentive to provide cheaply produced programming to the host station.

suggestion of the sponsorship approach portrays this statutorily mandated public interest obligation as something so loathsome that broadcasters should be able to pay someone else to do it for them rather than representing that quality children's programming is something stations are obliged to do in exchange for having a license. By allowing broadcasters to largely buy their way out of their public interest obligations, the sponsorship program undermines the idea often touted by broadcasters and recently affirmed by the Supreme Court that broadcasters are "special" due to their public interest responsibilities and thus, deserve special treatment, such as "must carry" and other privileges.¹⁴⁸

There is also something very disingenuous about permitting a sponsor station to air popular children's entertainment programs such as the "Mighty Morphin Power Rangers" opposite its sponsored educational programs which would be airing on a competing host station. The sponsorship would allow a station to compete with, and possibly undermine, its own statutorily mandated educational programming obligation.¹⁴⁹

¹⁴⁸ See Turner Broadcasting Co., Inc. v. FCC, 114 S.Ct. 2445, 2458-2464 (1994).

¹⁴⁹ Further, the Notice suggests that program sponsorship could cause a large portion of core programming to shift from more popular to less popular stations in a market, resulting in the creation of an educational children's channel. Notice at ¶ 79. However, Commenters sincerely doubt that such a channel would be created because the creation of one educational channel for children would require participation and financial support by a majority of stations. Even if such a channel were created, Commenters fear it would consist of poorly funded programs purporting to be educational that would compete with and be

Finally, adoption of program sponsorship will increase the administrative costs of complying with the CTA for both the stations and the FCC. Broadcasters would incur more record keeping costs as they would be required to keep detailed records of their sponsorship transactions.¹⁵⁰ Tracing the sponsorship of programs would be confusing and complicated, which would increase the burden on the FCC. Based on broadcasters' prior track record in disclosing information regarding compliance with the Children's Television Act, reliance on broadcasters' reporting could prove to be problematic for both the Commission and the public. For these reasons, Commenters strongly oppose the implementation of the sponsorship approach.

B. If Program Sponsorship is Adopted, It Should Include the Safeguards Described Below

If the sponsorship approach is nonetheless adopted, it should be structured so as to maximize programming choices for children. First, double counting should not be permitted. The

undermined by other well-funded entertainment programs. This too would largely defeat the purpose of the CTA. Further, sponsorship could result in nothing more than the recycling of old shows rather than stimulating the production of new programming.

¹⁵⁰ Under this approach, broadcasters should be required to track their sponsorship funds to make certain the money was spent on educational programming and not on the host station's operating costs. In addition, broadcasters should be required to keep records showing that the sponsorship was between stations with similar signal contours so that the sponsored educational programming still reached the audience the sponsor station had an obligation to serve. Finally, in order to assure that the public and the Commission has access to these records, broadcasters should be required to keep these records in the station's public file and to annually submit them to the FCC.

purpose of the CTA and adoption of programming standards is to increase the amount of educational programming available to children. Permitting both the sponsor and host broadcasters to count the same program toward their obligation would undermine this purpose by resulting in an overall decrease in children's programming. To avoid this result, only the sponsor station should be allowed to count the sponsored program. The host station should not receive credit for the sponsored program. This solution seems most fair since it is the sponsor station that will have provided the resources to produce and create the educational program.

Second, Commenters agree that stations should not be permitted to meet their entire obligation by sponsoring programs on other stations as the CTA specifically requires that all stations provide some educational programming.¹⁵¹ To fulfill the standards, Commenters believe that broadcasters should be required to air seven hours of core programming on their own station. But if the Commission adopts the program sponsorship approach, then stations should be permitted to sponsor at most either one hour or one-third of the programming standard, whichever is lesser, on a host station.

Third, Commenters agree with the Notice¹⁵² that stations should only be allowed to sponsor programs on host stations that serve largely the same potential viewers. Commenters support the

¹⁵¹ 47 USC 303(b) (1990).

¹⁵² Notice at ¶ 82.

Commission's proposal that commercial stations be permitted to sponsor new educational programs on non-commercial stations. PBS has an excellent track record of providing quality educational programming for children. But Commenters strongly oppose allowing sponsor stations to simply fund existing children's educational programming on PBS as fulfillment of their CTA obligation. The program should not allow commercial stations to merely fund programs that are currently on the air. Instead, to qualify, the sponsor stations should have to fund or create new and additional children's educational programming to air on PBS.

Host stations should also be required to identify the sponsor station of every sponsored program at the time it is aired. Requiring host stations to credit the sponsor station in both their reporting requirement and on-air announcements would guarantee a certain level of accountability for the quality of the sponsored programming.

Finally, both the program sponsor and host should be required to include all of the information described above on their children's programming reports. The host station must also verify that it, in fact, aired the program, although it did not receive any credit. Without this information it would be impossible for the FCC and the public to follow the sponsored program back to its source and thus help achieve the Commission's goal of increasing public involvement in the enforcement of the CTA.¹⁵³

¹⁵³ See, Notice at ¶ 4.

CONCLUSION

There is no dispute that "'[o]ur children are this nation's most valuable resource.'"¹⁵⁴ Likewise, there is no dispute as to the power of television to educate and inform children. Innumerable studies document that educational television benefits children. Moreover, educational children's programming can provide an alternative viewing option to the violent and adult-oriented programming that is so prevalent on the airwaves today.

Thus, the stage is set for the a critical moment in communications history. The FCC can make its expectations of broadcasters in the important areas of children's educational programming concrete and specific, or it can continue to leave these decisions to the marketplace, where experience demonstrates that the drive to maximize profit also drives out sustained efforts to provide children's educational programming.

Many of the people joining in these comments were children themselves when the Commission first beseeched broadcasters to do more for children thirty-five years ago and now have children of their own. At that time, then FCC Chairman Newton Minow dubbed children's viewing choices a "Vast Wasteland." That description still fits today. We ask how many more generations does the FCC want to experiment on with this well-documented, failed strategy of voluntary compliance? We join Chairman Hundt in "point[ing] a finger at the only institution with the responsibility to act exclusively for the public interest -- the Federal Communications


¹⁵⁴ Notice at ¶ 10, quoting Senate Report at 5.

Commission." ¹⁵⁵

For these reasons, and those enumerated above, we ask the FCC to adopt a programming standard of one hour per day of programming specifically designed to educate and inform children, at times when children are likely to be watching. Furthermore, the FCC should take the other initiatives, described in these comments, to improve the monitoring and enforcement of the Children's Television Act.

Of counsel:

Elizabeth Baird
Suzanne Underwald
Georgetown University
Law Students



Ilene R. Penn, Esq.
Angela J. Campbell, Esq.
Citizens Communications Center Project
Institute for Public Representation
Georgetown University Law Center
600 New Jersey Ave., N.W., Suite 312
Washington, D.C. 20001
(202) 663-9535

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¹⁵⁵ Remarks of Chairman Reed Hundt, National Press Club, July 27, 1995, at 3.

APPENDIX A

Appendix A

Quantitative Analysis of Core Children's Educational Programming on KCAL-TV (Los Angeles)

| Year | Qtr | Avg. hours aired (6am - 11pm) | Avg. hours aired (7am - 11pm) |
|------|-----|-------------------------------------|-------------------------------------|
| 1991 | 4 | 0 | 0 |
| 1992 | 1 | 0 | 0 |
| | 2 | 0 | 0 |
| | 3 | 0 | 0 |
| | 4 | 0.5 | 0 |
| 1993 | 1 | 0.5 | 0 |
| | 2 | 0.5 | 0 |
| | 3 | 0.11 | * |
| | 4 | 0.89 | 0.42 |
| 1994 | 1 | 3.5 | 0.5 |
| | 2 | 3.96 | 1.04 |
| | 3 | 3.77 | 0.77 |
| | 4 | 3.32 | 0.5 |
| 1995 | 1 | 3.42 | 0.5 |
| | 2 | 3.69 | 0.92 |

*Quarterly children's programming lists for the 3rd quarter of 1993 failed to indicate airtimes for all the shows claimed.

APPENDIX B



C E N T E R F O R M E D I A E D U C A T I O N

Public Attitudes About Children's Television

Summary of Survey Results

The following are major findings of public attitudes about children's programming on commercial broadcast television. They are based on a national survey of 514 men and 513 women conducted in late August 1995.

An overwhelming majority of the public wants more educational programs for children on commercial television.

More than four in five American adults (82%) believe there is not enough educational children's programming on commercial broadcast television. Among those with children the percentage rises to nearly nine of ten (88%).

More than three-quarters of Americans believe there are good reasons to regulate children's TV more strictly than programming intended for general or adult audiences.

Eighty percent of respondents in the survey believe there are good reasons to regulate children's television. The public believes more regulation is in order because: (1) children watch so much TV; (2) television has such a strong impact on children and; (3) TV reaches so many children.

Most people support specific requirements for broadcasters of one hour or more per day of educational programming for children; a substantial number believe there should be a requirement for two hours a day.

When respondents were asked how much children's educational programming broadcasters should be required to air, the single most frequent answer was two hours a day (31%), with the second most frequent answer being one hour a day (29%), yielding a total of 60% supporting one hour a day or more. Among respondents with children, the totals of those calling for one hour a day or more were even higher (64%), with more than a third (35%) believing the requirement should be two hours a day.

One of the reasons that people support regulation of children's programming is that they believe it has a negative impact.

When asked about the nature of TV's influence on children (that is, whether it is positive, negative or neutral), and the power of that influence (very strong, somewhat strong and so forth), overall, the negatives exceeded the positives by two-to-one. Forty-five percent of respondents believe that children's programs on commercial broadcast television are having a negative influence, with ten percent saying the influence is "very negative." Only 23% of the sample believe that children's programming is having a positive influence on children's lives, with just six percent saying the impact is very positive.

The majority of people believe that the quality of children's programming is not getting better; more than a third believe it is getting worse.

Less than a quarter of the respondents (23%) say that children's television is "good" or "excellent," with only a tiny fraction of the respondents (2%) saying the programming is excellent. More people say the quality of children's programming is "poor" (20%) or "very poor" (8%) than the percentage that say it is good or excellent. The two most frequently cited reasons for the lack of quality in children's broadcast programming were violence (43%) and insufficient educational programming (25%).

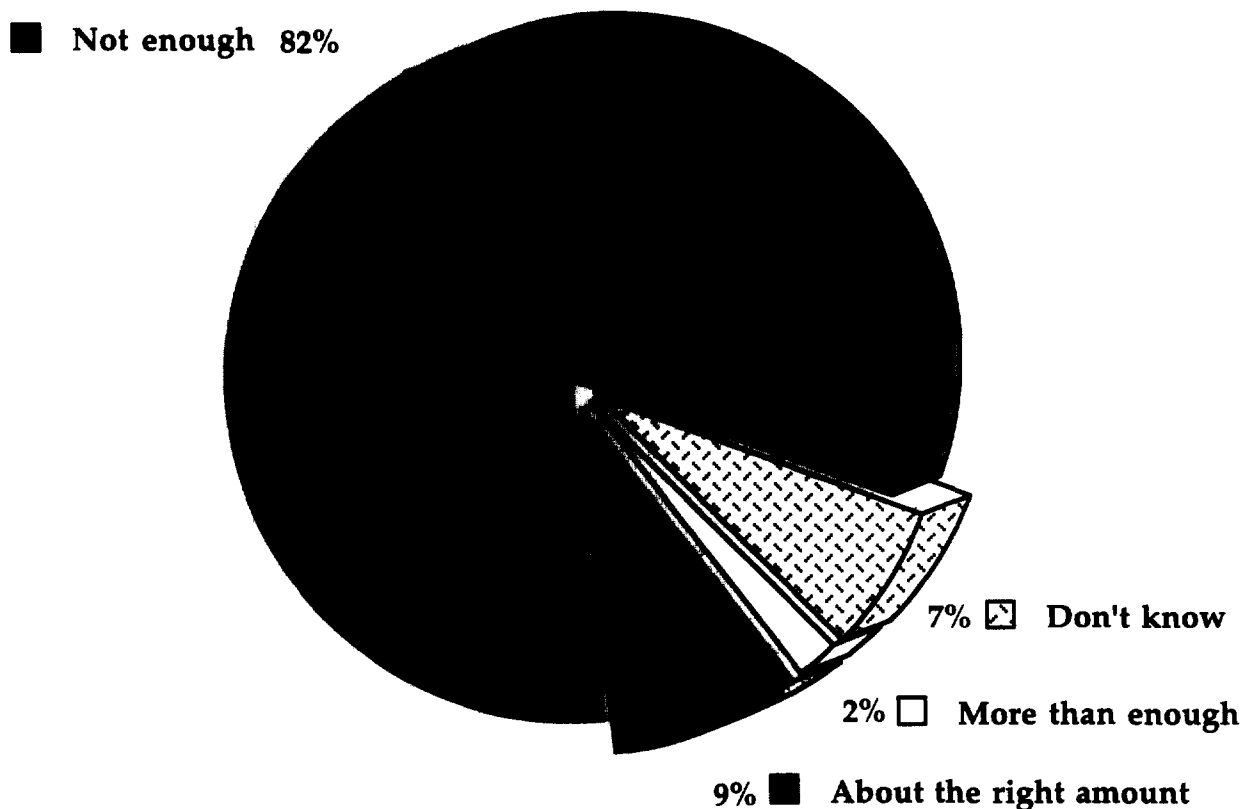
Only one in eight respondents (12%) believes that the quality of commercial children's TV is getting better, while more than three in eight (38%) say it is getting worse and 41% say it is staying the same. In addition, very few respondents who ranked the current quality of programming as fair or worse expect improvement. Nearly two-thirds of the sample (63%) say programming is only fair or worse and not improving.

Most people blame the networks and advertisers for the lack of quality in children's television.

Respondents were far more likely to assign responsibility to the television networks and advertisers than to the viewing public. Over two-thirds of the sample identified the networks (41%) or advertisers (27%), while only 16% held viewers themselves responsible for the lack of quality in children's television. Among those with children, over three-quarters gave these responses, with networks being held responsible by almost one-half (48%).

The survey was designed and analyzed by Mark Cooper, Ph.D., of Citizens Research. The questions were part of a national random digit dial computer assisted survey conducted August 24-27, 1995. The questions were developed by relying on questions which had been asked by major survey organizations in previous national opinion surveys. The wording made it clear that all references were to commercial broadcasting outlets, and not cable TV or PBS. Along with standard demographic questions such as income and education level, respondents were asked if they have at least one child under the age of 18. The survey results have a margin of error of +/- 3 percentage points.

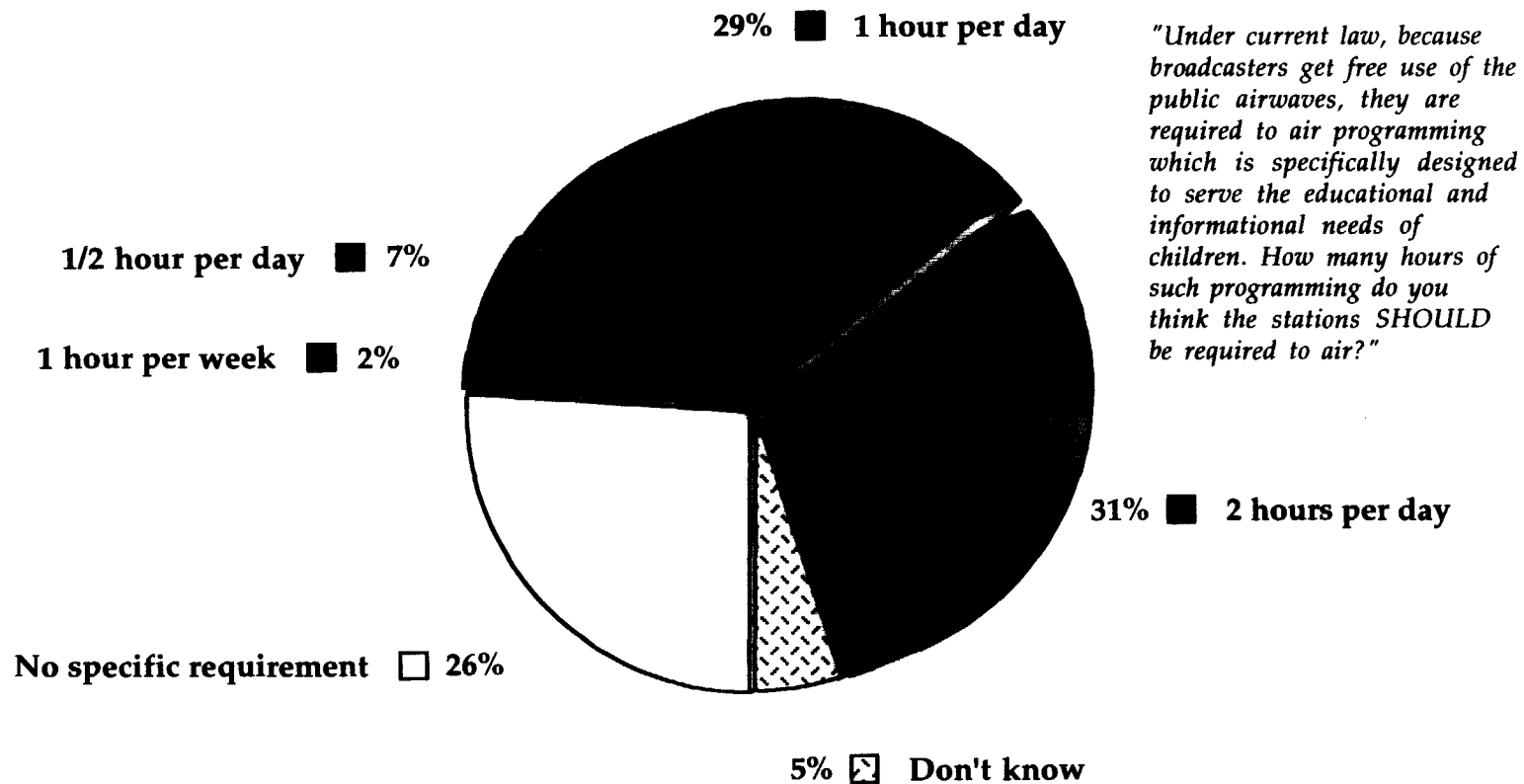
82% of the Public Believe There Is Not Enough Educational Children's Programming on TV.



"Thinking of the kinds of television programs that are suitable for children to watch, and also thinking about the amount of time you think children should watch television, would you say that on commercial television, there are _____ (of) educational children's programs to watch?"

From a poll, conducted August 24-27, 1995, commissioned by the Center for Media Education, Washington, DC.

60% of the Public Believe Broadcasters Should Be Required To Show an Hour or More a Day of Educational Children's Programs.



From a poll, conducted August 24-27, 1995, commissioned by the Center for Media Education, Washington, DC.

APPENDIX C

Center for Media Education

Center for Media Education (CME) is a nonprofit 501(c)(3) public interest policy and research organization dedicated to promoting the democratic potential of the electronic media. CME's Campaign for Kids' TV is aimed at improving the quality of children's television, educating the public about the Children's Television Act, and empowering parents and educators to deal more effectively with the media.

Peggy Charren

Peggy Charren is the founder of Action for Children's Television (ACT) and a consultant on children's media.

Advocates for Children and Youth/Maryland Campaign for Kids' TV

Advocates for Children and Youth, Inc. (ACY) is a statewide, nonprofit, multi-issue child advocacy organization in Maryland. ACY develops, implements, and monitors programs and policies to help ensure that all of Maryland's children are healthy, educated, safe, and economically secure. The Maryland Campaign for Kids' TV is a project of ACY and was launched in 1992 to make sure TV broadcasters in Maryland comply with the Children's Television Act.

American Academy of Child and Adolescent Psychiatry

The American Academy of Child and Adolescent Psychiatry represents over 5,200 child and adolescent psychiatrists, physicians with at least five years of additional training beyond medical school in general, and in child and adolescent psychiatry.

American Association of School Administrators

American Association of School Administrators (AASA) is one of the most longstanding and respected educational leadership organizations in the nation. Our members, numbering 16,000, are school superintendents, central administrators, principals, and others who provide leadership and direction for schools. Since its founding in 1865, AASA has been an advocate for children.

American Psychiatric Association

American Psychiatric Association (APA) is a medical specialty society representing more than 41,000 psychiatrists worldwide.

Association for Library Service to Children/American Library Association

Association for Library Service to Children/American Library Association is a professional organization committed to improving

and expanding library services for children. As such, the Association actively pursues liaisons and works with other child advocacy groups in order to advance the causes of children and families.

Center for Media Literacy

The Center for Media Literacy, located in Los Angeles, CA, is a not-for-profit membership organization providing leadership, training, and the publication/distribution of books, videos, and teaching materials on topics such as violence in the media, children and television, sexism/racism in the media, and tobacco and alcohol advertising. With an active membership base of 2,000+ and a service base of over 10,000 individuals and institutions, the Center is the "nerve center" for the growing media literacy movement in schools, churches, after-school programs, and community centers throughout the United States.

Center for the Study of Commercialism

Center for the Study of Commercialism is a nonprofit research and advocacy group concerned with the over-commercialization of American society.

Consumer Federation of America

Consumer Federation of America (CFA), is a coalition of 240 pro-consumer groups from around the country with a combined membership of 50 million. Since 1967, CFA has been representing consumer interests before Congress, federal regulatory bodies, and the courts.

Council of Chief State School Officers

Council of Chief State School Officers (CCSSO) is a nationwide nonprofit organization comprised of the public officials who head the departments of elementary and secondary education in the States, the U.S. Extra-state jurisdictions, the District of Columbia, and the Department of Defense Dependents' Schools.

Mediascope

Mediascope is a nonprofit, public policy organization founded in 1992 to promote constructive depictions of health and social issues in the media; including film, television, music, and interactive games. Mediascope performs research, produces publications, serves as an informational clearinghouse, and provides forums focused on pressing and controversial topics, such as violence and how its depiction may affect viewers, for researchers, social scientists, and the Hollywood creative community.

National Association of Child Advocates

— National Association of Child Advocates (NACA) works for the safety, security, health, and education of all America's children by building and supporting state and community-based independent child advocacy organizations. NACA speaks on national policy issues as the collective voice of 32 state-based child advocacy organizations who are full members.

National Association for the Education of Young Children

National Association for the Education of Young Children (NAEYC) is the nation's oldest and largest organization of early childhood professionals and others working to improve the quality of early childhood education services available to young children, birth through age 8, and their families. Based in Washington, DC, NAEYC has a membership approaching 90,000 and a network of more than 450 local, state, and regional affiliated childhood organizations.

National Association of Elementary School Principals

National Association of Elementary School Principals, founded in 1921, is a professional organization serving more than 26,000 elementary and middle school educators. The Association believes that the progress and well-being of every child must be at the forefront of all elementary and middle school planning and operation. It is committed to educational excellence and high professional standards among educators.

National Association for Family and Community Education

National Association for Family and Community Education (FCE) is a volunteer organization with 43,000 members in 39 states, two territories, and the District of Columbia. The mission of FCE is to strengthen individuals and families through education, leadership development, and community action. FCE has a "children and television" project with the main focus on helping children benefit from the television they view.

National Black Child Development Institute, Inc.

— National Black Child Development Institute, Inc. (NBCDI), founded in 1970, is dedicated to improving the quality of life and opportunities for African-American children and their families through direct services, public education, leadership training, and research. NBCDI focuses primarily on issues and services that fall within four areas: health, child welfare, education, and child care/early childhood education. The organization monitors public policy issues that affect African-American children and educates the public through regular publications, an annual conference, and other public education fora. NBCDI is supported by an affiliate network of 42 cities across the United States.

National Council of La Raza

National Council of La Raza (NCLR) is a private, nonprofit organization representing 200 community based organizations in 37 states, Puerto Rico, and the District of Columbia that provide housing, education, employment, immigration, and social services to more than two million Hispanics annually.

National Education Association

National Education Association (NEA) is the nation's largest professional organization as well as the largest employee organization, representing elementary and secondary teachers, higher-education faculty, educational support personnel, retired educators, and students preparing to become teachers. NEA is focused on the issues and needs of education and the teaching profession.

National PTA

National PTA, with nearly 7 million members, is the nation's largest volunteer child advocacy organization committed to uniting the home, school, and community on behalf of children and families.

Office of Communication of the United Church of Christ

United Church of Christ (UCC) is a union of Protestant churches, the Congregational Christian church and the Evangelical and Reform church, which collectively includes more than 1.5 million people, of whom a significant number are racial minorities. The Office of Communication is a national arm of the United Church of Christ responsible for developing the Church's policies on the electronic mass media. Since the mid-1950's, the office of Communication has participated in proceedings before the Federal Communications Commission, promoting a greater role for citizens in Commission regulatory proceedings.